



Court File No. CV-26-00001566-0000

**ONTARIO
SUPERIOR COURT OF JUSTICE**

BETWEEN:

ETIENNE VINCENT MARIO GADBOIS

Plaintiff

- and -

SANDRO CELLUCCI

Defendants

STATEMENT OF CLAIM

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the Plaintiff. The Claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or an Ontario lawyer acting for you must prepare a Statement of Defence in form 18A prescribed by the Rules of Civil Procedure, serve it on the Plaintiff's lawyer or, where the Plaintiff does not have a lawyer, serve it on the Plaintiff, and file it, with proof of service, in this court office, **WITHIN TWENTY DAYS** after this Statement of Claim is served on you, if you are served in Ontario.

If you are served in another province or territory of Canada or in the United States of America, the period of serving and filing your Statement of Defence is forty days. If you are served outside Canada and the United States of America, the period is sixty days.

Instead of serving and filing a Statement of Defence, you may serve and file Notice of Intent to Defend in Form 18B prescribed by the Rules of Civil Procedure. This will entitle you to ten more days within which to serve and file your Statement of Defence.

IF YOU FAIL TO DEFEND THIS PROCEEDING, JUDGMENT MAY BE GIVEN AGAINST YOU IN YOUR ABSENCE AND WITHOUT FURTHER NOTICE TO YOU. IF YOU WISH TO DEFEND THIS PROCEEDING BUT ARE UNABLE TO PAY LEGAL FEES, LEGAL AID MAY BE AVAILABLE TO YOU BY CONTACTING A LOCAL LEGAL AID OFFICE.

IF YOU PAY THE PLAINTIFF'S CLAIM, and \$4000 for costs, within the time for serving and filing your statement of defence you may move to have this proceeding dismissed by the court. If you believed the amount claimed for costs is excessive, you may pay the plaintiffs claim and \$400 for costs and have costs assessed by the court.

TAKE NOTICE: THIS ACTION WILL AUTOMATICALLY BE DISMISSED if it has not been set down for trial or terminated by any means within five years after the action was commenced unless otherwise ordered by the court.

Date 27-APR-2026

Issued by *Angela Maria*
Local Registrar

Address of court office: 50 Eagle Street West
New Market Ontario
L3Y 6B1

TO: SANDRO CELLUCCI
292 boul. De l'Ange-Gardien
L'Assomption, Quebec
J5W 1S1

THIS ACTION IS BROUGHT AGAINST YOU UNDER THE SIMPLIFIED PROCEDURE PROVIDED IN RULE 76 OF THE RULES OF CIVIL PROCEDURE.

CLAIM

The Plaintiff claims:

- a) Judgment against the Defendant in the amount of \$199,000.00, representing the sum suffered by the Plaintiff pursuant to economic and emotional prejudice.
- b) Judgment against the Defendant for interest at the rate of 6% per annum, calculated from May, 2024 to the date of judgment, in accordance with the agreement between the parties.
- c) In the alternative, the Plaintiff claims pre-judgment interest on the sum of \$199,000.00 pursuant to section 128 of the Courts of Justice Act, R.S.O. 1990, as amended, from the date of demand to the date of judgment.
- d) In the alternative, the Plaintiff claims post-judgment interest pursuant to section 129 of the Courts of Justice Act, R.S.O. 1990, as amended.
- e) If applicable, judgment against the Defendant for punitive and exemplary damages in an amount to be determined by this Honourable Court;
- f) Costs of this action on a substantial indemnity basis, together with any goods and services tax which may be payable on any amount pursuant to the *Excise Tax Act*, R.S.C., 1985, as amended and applicable disbursements; and
- g) Such further and other relief as this Honourable Court deems just.

BACKGROUND INFORMATION

1. The Plaintiff, Etienne Vincent Mario Gadbois, is an individual residing in the Province of Ontario.
2. The Defendant, Sandro Cellucci, is an individual who, in 2013-2014, held a senior legal position at Hydro-Québec, including as Director of Legal Affairs or in a supervisory capacity.
3. In 2013-2014, Katherine Hebert-Vachon, the Plaintiff's wife, was employed by Hydro-Québec as a lawyer and reported, directly or indirectly, to the Defendant.
4. The Plaintiff pleads that the Defendant occupied a position of authority, trust, and power over Katherine Hebert-Vachon in the workplace.
5. The Plaintiff alleges that, during or around 2014, the Defendant engaged in a pattern of inappropriate and unwelcome conduct toward Katherine Hebert-Vachon, including sexual remarks and the transmission of sexually explicit materials.
6. The Plaintiff further alleges that the Defendant initiated or engaged in an intimate personal relationship with Katherine Hebert-Vachon while in a position of authority over her.
7. The Plaintiff pleads that such conduct constituted an abuse of power and a serious breach of professional and workplace standards.
8. The Plaintiff states that he became aware of the Defendant's conduct and confronted the Defendant.
9. The Plaintiff pleads that, in an email dated September 29, 2014, the Defendant admitted to having engaged in an intimate relationship with Katherine Hebert-Vachon.
10. The Plaintiff relies on this email and will produce it at trial as evidence of the Defendant's conduct.

11. The Plaintiff further pleads that the Defendant's conduct formed part of a broader pattern of inappropriate behaviour and that the Defendant had a reputation for such conduct within the workplace.
12. The Plaintiff pleads that the Defendant was ultimately terminated from his position at Hydro-Québec following allegations or findings of sexual harassment.
13. The Plaintiff pleads that the Defendant's conduct was intentional, reckless, and in disregard of the foreseeable consequences to the Plaintiff.
14. The Plaintiff pleads that the Defendant knew or ought to have known that his actions would cause significant emotional distress, harm, and disruption to the Plaintiff and his family.
15. As a result of the Defendant's conduct, the Plaintiff suffered emotional distress, humiliation, psychological harm, and disruption to his family life, including harm affecting his relationship with his children.
16. The Plaintiff pleads that the Defendant's conduct caused serious and, in some respects, irreparable harm to the Plaintiff's family stability and well-being.
17. The Plaintiff further suffered economic loss, the particulars of which will be provided prior to trial.
18. The Plaintiff pleads that the Defendant's conduct constitutes intentional infliction of mental suffering and other actionable wrongs.
19. The Plaintiff claims damages in the amount of \$199,000.
20. The Plaintiff further claims punitive damages on the basis that the Defendant's conduct was high-handed, abusive, and represented a marked departure from acceptable standards of behaviour.
21. The Plaintiff claims pre-judgment and post-judgment interest pursuant to the *Courts of Justice Act*.

22. The Plaintiff claims costs of this proceeding.
23. The Plaintiff will bring the Defendant's conduct to the attention of the Barreau du Québec, Hydro-Quebec and any other relevant regulatory authorities.
24. The Plaintiff claims such further and other relief as this Honourable Court deems just.

CONCLUSION

25. The Plaintiff pleads the Defendants caused significant economic and emotional prejudice to the Plaintiff;
26. The Plaintiff pleads that the Defendants must pay an amount of \$199,000 in favor of the Plaintiff for economic and emotional prejudice suffered by the Plaintiff;
27. The Plaintiffs propose that this action be tried at the Town of Newmarket, in the Province of Ontario;
28. The Plaintiff has performed all conditions precedent necessary to entitle the Plaintiff to judgment.

Dated: April 27, 2026

Lawyer for the Plaintiff
Valeriy Kurzhev
901-235 Gosford Blv
North York, Ontario, M3N 2W3

ETIENNE VINCENT MARIO GADBOIS

Plaintiff

SANDRO CELLUCCI

Defendant

Court File No. CV-

ONTARIO

SUPERIOR COURT OF JUSTICE

Proceeding commenced at Newmarket

STATEMENT OF CLAIM

V KURZHEV LAW

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